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FEDERAL COMMUNICATIONS COMMISSION JUL - 5 2001
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Federal-State Joint Board on)
Universal Service)
)
Multi-Association Group (MAG) Plan for)
Regulation of Interstate Services of)
Non-Price Cap Incumbent Local Exchange)
Carriers and Interexchange Carriers)

CC Docket No. 96-45 /

CC Docket No. 00-256

To: The Commission

PETITION FOR RECONSIDERATION and/or CLARIFICATION

of the

COALITION OF RURAL TELEPHONE COMPANIES

July 5, 2001

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SUMMARY

The Coalition of Rural Telephone Companies files this Petition for Reconsideration and/or Clarification of the Commission's recent decision adopting Universal Service mechanisms for Rural Telephone Company areas. The Commission's rules regarding the determination of specific areas associated with the provision of universal service and the quantification of services provided, both for the purpose of calculating high cost support for mobile, shared-spectrum service applications, are imprecise, incomplete, and/or lacking in an articulated rationale. For these reasons, the Commission should reconsider its decision on these matters and initiate a rulemaking to examine properly, and more fully, the outstanding issues.

The rule that would use the customer's billing address as a surrogate for the locations where mobile service is used lacks a valid conceptual framework. Accordingly, the Commission should reconsider its decision on this issue and propose for comment a conceptual approach that defines the actual service area or relative proration across multiple service areas with respect to mobile service use. A full examination of this issue is required to determine whether a surrogate or actual measure appropriately directs universal service support dollars to high cost networks for the purposes outlined in the Act.

Moreover, the rules that utilize the concept of the count of loops for USF support purposes are not defined for wireless, shared-spectrum applications. The Commission has not proposed or examined what the equivalent measure should be for wireless applications. Appropriate clarification and definitions are required to ensure that USF funds will be directed to, and used for, their intended purposes.

The Coalition also asks that the Commission proceed to develop procedures for wireless and mobile applications that will lead to the identification of the proper level and targeting of

universal service support dollars. In so doing, the procedures for both service location and the quantity of universal services to be supported must have some rational connection to the services actually provided, the need for universal service network support, and the objectives of Universal Service to be served. Moreover, the long term plan should provide support to wireless carrier's based on their cost of service, not the cost of service for an incumbent LEC. Instead of attempting to adapt incongruent wireline concepts to a wireless environment, the Commission should consider and adopt rules with respect to wireless applications that will not lead to "gaming" opportunities and will direct universal service support to network cost recovery in rural, insular and high cost areas in accordance with the specific and explicit direction of § 254 of the Act.

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To: The Commission

PETITION FOR RECONSIDERATION and/or CLARIFICATION
of the
COALITION OF RURAL TELEPHONE COMPANIES

The Coalition of Rural Telephone Companies (“Coalition”)¹ respectfully submits this Petition for Reconsideration and/or Clarification of unresolved issues with respect to the *Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking in CC Docket No. 96-45, and Report and Order in CC Docket No. 00-256* released on May 23, 2001, in the proceedings captioned above (“*Order*”).² Reconsideration and/or clarification of the *Order* is required because the rules that were adopted with respect to certain critical concepts and quantification methods under which universal service support dollars

¹ The members of the Coalition are state-organized groups of rural local exchange carriers (“LECs”) in Kansas, Minnesota, and Nebraska. The Coalition has previously participated in CC Docket No. 96-45 with respect to the issues discussed in this Petition. *See* Opposition of the Coalition of Rural Telephone Companies filed September 2, 1999, in CC Docket No. 96-45 (“September 1999 Opposition”); Opposition of the Coalition of Rural Telephone Companies filed December 17, 1999, in CC Docket No. 96-45 (“December 1999 Opposition”); and Reply Comments of the Coalition of Rural Telephone Companies filed January 10, 2000, in CC Docket No. 96-45 (“January 2000 Reply”).

² 66 Fed. Reg. 30080, June 5, 2001.

would be distributed to carriers providing shared-spectrum services to mobile users are undefined, arbitrary, or both.

The issues discussed in this Petition have been raised, but either have not been adequately resolved or addressed at all. The Coalition's concerns should not be mistaken as an opposition to the disbursement of USF support to qualified wireless carriers serving rural, high cost areas where such support would be consistent with the universal service goals of the Telecommunications Act of 1996. Unfortunately, the rules and regulations adopted by the Commission attempt to apply, to wireless networks and services, measurements of universal service support need based on incongruent wireline network concepts.

The Coalition urges the Commission to consider and examine conceptual approaches for wireless network universal service support that lead to reasonable and rational results that are consistent with § 254 of the Act. In the absence of reconsideration, the Commission's rules, or lack of rules, will lead to arbitrary and unanticipated results and will promote the very gaming of USF that the Commission has long strived to avoid. The current result, absent reconsideration, is inequitable to all carriers, including both wireline and wireless service providers, that have a legitimate need for universal service high-cost support.

Specifically, the rules that determine the specific service location (or multiple locations) for mobile service users and the quantification of "loops" in shared-spectrum, wireless applications are imprecise, incomplete, and/or lacking in an articulated rationale. Accordingly, the rules are arbitrary because they are incomplete and unworkable. For these reasons, the Commission should reconsider its *Order* and initiate a rulemaking to examine properly, and more fully, these outstanding issues.

I. THE ADOPTED RULE LACKS A VALID CONCEPTUAL FRAMEWORK TO ESTABLISH THE SERVICE LOCATION OR LOCATIONS FOR MOBILE USERS.

The Commission has adopted a rule that states that a competitive eligible telecommunications carrier (“ETC”) that provides mobile services shall use the mobile customer’s billing address for purposes of identifying the service location of a mobile wireless customer in a service area.³ The Commission concluded in the *Order* that the “customer’s billing address is a reasonable surrogate to identify a mobile wireless customer’s location . . . for the purposes of . . . per-line support.”⁴ A rule defining the relevant service area for wireless service provided to mobile customers is necessary because, under current Commission requirements, competitive ETCs receive support based on the per-loop amount that the incumbent LEC receives in each specific service location.⁵ This policy, unfortunately, will encourage arbitrary “customer location shopping” by ETCs to game the system in a manner that undermines the policy basis for the provision of universal service support to network costs in rural areas with high cost to serve networks. The amount of support for incumbent LECs, calculated on a per-loop basis, differs

³ *Order* at para. 180. The *Order* also observes that PCIA claims that the use of a customer’s address was not opposed. *Order* at n. 437. This is not entirely correct. It was the Coalition in its previous filings in this docket that brought these issues to the attention of the Commission and PCIA. In response, PCIA filed its Petition for Reconsideration and/or Clarification. See *Order* at n. 435. For example, in its filings in CC Docket No. 96-45, the Coalition explained that the rules were deficient in addressing what the service area of mobile customers should be. See, e.g., September 1999 Opposition at 33 and n. 100 (“The lack of clarity is compounded with respect to CMRS providers and application with respect to mobile services.” “Mobile services are obviously provided anywhere the mobile phone will work on the CMRS system, making a specification of a service location an extremely arbitrary consideration.”).

⁴ *Id.*

⁵ The disbursement of high cost support dollars on a per-unit basis using the quantity of loops as the multiplier is a fundamental flaw in the overall Universal Service plan. Costs are not incurred on a per-unit basis and the amount of high costs for which support is required is not directly proportional to the number of working loops. This flaw will be addressed in the upcoming *Further Notice of Proposed Rulemaking* set forth in the *Order*.

significantly from location to location, thereby making the designation of a specific service location (or a proration across multiple service locations) important in the calculation of the proper amount of support for competitive ETCs.⁶ As the Commission observes, because a mobile user does not have a fixed location, there remains a question as to how to relate a mobile customer to a specific service area, wirecenter, or disaggregated zone.⁷ This question, however, arises primarily as a result of the policy that would disburse USF funds, for specific service areas, wirecenters, or zones, to non-incumbent ETCs based either on an incumbent LEC's network and costs or the hypothetical network cost of a single wireline carrier.

The Coalition agrees with the Commission that the use of a billing address may allow arbitrage opportunities with respect to the receipt of universal service support dollars and may result in disbursing improper USF amounts to carriers and/or directing support to areas where support is not needed.⁸ Accordingly, the Commission appropriately recognizes its responsibility to monitor the reasonableness of this approach.⁹ Unfortunately, the Commission has not articulated a conceptual approach that reasonably identifies either the actual service area (or

⁶ This issue is not solely a Rural Telephone Company area or rural user universal service issue because the service area is equally important with respect to both rural and non-rural carrier areas. As such, it is not clear that this issue was intended for the Rural Task Force because the issue is important to the entire industry. The issue was previously set forth before the Commission by the Coalition and PCIA in the context of the full CC Docket No. 96-45 proceeding.

⁷ See, e.g., *Order* at paras. 181 and 184. The question is not really how to relate a mobile user to a single location. A mobile customer is actually related, through the customer's use of mobile services, to multiple service areas, wirecenters, and disaggregated zones. The issue should be viewed as how to determine the relative use of a mobile customer across multiple service areas, wirecenters and zones.

⁸ *Order* at para. 183.

⁹ *Id.*

areas) for wireless service to customers that may be constantly moving over large areas and using telecommunications service in multiple places for differing amounts of time. Moreover, the Commission also observes that there is no readily available data to determine the specific geographic areas over which mobile customers typically use telecommunications services.¹⁰ Accordingly, the Commission has no basis to conclude that the surrogate “customer billing address” is an appropriate approach. The use of the billing address may have little relationship to the actual utilization of wireless services or the provision of services for which universal service support should be directed.¹¹

For these reasons, the Commission must reconsider and/or clarify its *Order* to propose for comment a conceptual approach that defines the actual service area or relative proration across multiple service areas with respect to mobile customers that use their telecommunications services across a wide geographic area that may stretch across multiple service areas, and potentially across the nation.¹² Without a full discussion of the actual and specific conceptual approach, there

¹⁰ *Id.* at para. 182.

¹¹ There are no means to compare the surrogate approach to the actual because there is no articulation by the Commission or in the rules of what the actual conceptual framework should be with respect to the location (or prorated locations) for mobile customers.

¹² The mobile service area is only limited to where the service user can obtain a signal. Today, it is common for mobile customers to use their mobile phones in locations across the entire nation. What is the service area for a customer that uses his or her phone in several locations in several states for varying amounts of time during a single month? What is the service location for a mobile user that makes or receives calls in areas where there is no population? Beyond the surrogate approach, there has never been an explanation or discussion of how mobile users that use their phones across multiple locations are to be assigned to a single location (or whether it makes sense to assign them to a single location) or how these users should be prorated across multiple locations.

is no basis to adopt or to determine the propriety of any surrogate approach.¹³ In the absence of a factual basis, the utilization of the “customer billing address” surrogate is contrary to the statutory intent of § 254 of the Act.

II. THERE ARE NO DEDICATED CABLE AND WIRE FACILITY LOOPS FOR SHARED-SPECTRUM, WIRELESS SERVICE, AND THERE IS NO ONE-TO-ONE CORRESPONDENCE BETWEEN WIRELINE LOOPS AND WIRELESS CUSTOMERS.

Apart from the service location conceptual issue discussed above, the rules are also undefined with respect to the quantity of service for which a shared-spectrum, wireless service provider should qualify for fund disbursement purposes. Where universal service goals would be advanced, wireless service providers should be entitled to receive funds in furtherance of these goals. However, there are no rules to direct the Universal Service Administrative Company (“USAC”) with respect to how to quantify the amount of support dollars for shared-spectrum, wireless providers.

In order to receive support, a competitive ETC must report “the number of working loops” that it serves in a particular service area.¹⁴ This concept, however, is undefined with respect to shared-spectrum applications and should be addressed to ensure proper targeting of USF funds. Working loops are defined as “Exchange Line Cable & Wire Facilities loops used jointly for exchange and message telecommunications service, including pay telephones but

¹³ It takes only common sense to realize that, for the vast majority of mobile service users, the service is not obtained for placing and receiving calls at the billing address location. In fact, common sense indicates that a customer obtains mobile service for the primary purpose of using his or her phone when not located at the billing address. See January 2000 Reply at 2-3, n. 9 and n. 10.

¹⁴ See, generally, 47 C.F.R. § 54.307.

excluding WATS and TWX.”¹⁵ The basic concepts embodied in these rules (*i.e.*, loops, wires, cable, and wirecenter) are undefined for shared-spectrum, wireless service applications and, in some cases, make no conceptual sense in the wireless context. Regardless of the conceptual ambiguities, there has been no proposal, discussion or explanation of how wireless carriers are to quantify the concept of “loops” in a shared-spectrum application. Appropriate clarification and definitions are required to ensure that USF funds will be properly directed to, and used for, their intended purposes.¹⁶

Users of mobile and some fixed wireless services generally share spectrum.¹⁷ Unlike a dedicated loop facility, there is no dedicated channel available to each user. The engineering design presumes that not all users will want to obtain a local communications channel at the same time. Therefore, a dedicated message path only exists when, where, and for the length of time that a wireless user actually is placing or receiving a call. Each individual transmission by a user establishes a momentary and geographically different transmission path. The Commission has not proposed, and there has not been any public comment, regarding what the quantitative relationship or defined concepts should be with respect to the provision of momentary shared-spectrum channels compared to the provision of dedicated loops.¹⁸

¹⁵ 47 C.F.R. § 54.307(b).

¹⁶ Wireless carriers are submitting information to USAC and receiving, or will receive, support dollars, despite the lack of rules and definitions.

¹⁷ Some wireless loop applications provide a dedicated channel for the customer’s use.

¹⁸ While the Commission may have concluded that wireless providers should be deemed to be providing single line service for the purpose of ETC designation, there has been no determination of what the quantitative relationship should be between the availability of channels, the number of potential wireless users, and how these quantities relate to an equivalent number of “loops” in a dedicated single-line wireline application. Consider the following simple example. A
(continued...)

The Coalition has previously brought these issues to the attention of the Commission and the industry.¹⁹ However, the Commission has not proposed for comment a set of definitions or approaches either with respect to quantification of “loops” in shared-spectrum applications or an appropriate alternative. PCIA has previously proposed that the number of working phone numbers used by wireless customers be used as a surrogate for loops. However, this approach is unacceptably arbitrary because there is no meaningful relationship between the amount of “universal service” provided by a wireless carrier and the quantity of numbers.²⁰ Wireline LECs do not use the quantity of working numbers for USF support purposes because to do so would be equally arbitrary. Nor are the quantity of wireless phone units in service, or the number of billing addresses correlated with the quantity of universal service provided or the amount of high cost to be supported.²¹ Appropriate and meaningful concepts are required to ensure that available universal service funds are properly directed.

¹⁸(...continued)

wireline LEC has 1,000 single line working loops dedicated to 1000 users. The loops do not limit the capacity of the users. Compare that example with a wireless carrier that has 1,000 customers in a particular location, but only has the channel capacity to allow those customers to establish 100 “wireless loops” at any one time. The wireless and wireline providers also engineer their switch capacity which may, or may not be, comparable. The wireline LEC engineers its system so that a sizable portion of the 1,000 customers can be participating in a intra-central office call, and the outgoing trunks are engineered to assure no more than a 1 percent blocking at the busy hour. Whatever the traffic sensitive engineering may be for either the wireless or wireline providers, in this example, only 100 “loops” can be working at any given time for the wireless carrier. For this example, what is the equivalent number of “loops” that the wireless carrier is providing? Moreover, the loops for a wireline carrier can be physically observed and counted. There is no physical plant to count for wireless carriers.

¹⁹ December 1999 Opposition at pp. 14-17, and January 2000 Reply at pp. 2-3 and n. 10.

²⁰ See December 1999 Opposition at p. 16 and notes 51 and 52 for a discussion of why the use of working telephone numbers would be arbitrary and incongruent.

²¹ See, *id.*, at pp. 16-17 and notes 53 and 54.

III. THE COMMISSION SHOULD ADOPT PROCEDURES WHICH WILL LEAD TO THE IDENTIFICATION OF THE PROPER LEVEL OF UNIVERSAL SERVICE SUPPORT FOR WIRELESS CARRIERS.

1. A Surrogate Approach For Either Service Location or the Quantity of Universal Service Provided Must Have Some Rational Connection to the Service Actually Provided, the Need for Universal Service Support, and the Objectives to be Served.

A concept inherent in Section 254 is that Universal Service support should be provided where necessary to ensure that quality services are available at just, reasonable and affordable rates, in all regions of the Nation, including to low income subscribers and rural, insular and high cost areas.²² As discussed above, the user's billing address has no rational relationship to the need for such support or whether support will be directed to the achievement of the statutory goals. The *Order* nevertheless essentially defaults to the use of billing address for the sole reason of administrative simplicity, despite the fact that a billing address may have only a coincidental relationship to the need for such support and despite the obvious, recognized incentives such a surrogate creates for abuse.²³ No explanation whatever is provided as to how billing address relates to the need for Universal Service support or the achievement of the statutory objectives. Two alternatives are briefly considered and rejected on the basis that wireless carriers do not have the requisite data available.²⁴

One alternative, use of residential or primary business location, is essentially a variation on the billing address surrogate in that it also bears no relation to actual usage or support need. The other alternative discussed briefly is the system adopted in the Mobile Communications Sourcing

²² 47 U.S.C. 254(b)

²³ *Order* at para. 181-182.

²⁴ *Id.* at para. 182

Act (“MCSA”).²⁵ In this Act, Congress addressed an almost identical issue of where does mobile use take place for the purpose of taxation. The MCSA adopts the concept of “Place of Primary Use” defined as a “street address representative of where the customer’s use of mobile telecommunications service primarily occurs.”²⁶ The *Order* dismisses use of this system on the grounds that the data bases involved are not currently in operation.²⁷

The principal failing of the *Order* is that it adopts no process by which the Commission commits to propose and examine a more rational system, nor any systematic approach to enforcement.²⁸ Because there are currently a small number of wireless carriers certified as ETCs, the billing address surrogate could have been defensible as a purely interim measure, *provided* the Commission had set forth a timetable and process to establish a reasonably rational system. In the absence of any such commitment, it is inevitable that carriers and customers will be accustomed to receiving support where none is justified and will then create major political obstructions to rationalizing of the system. Had the Commission put carriers and customers on notice that the

²⁵ *Id.* and 4 U.S.C. 116-124.

²⁶ 4 U.S.C. 124(8).

²⁷ *Order* at para. 182. Of course, the objectives of taxation policy and universal service policy are not the same.

²⁸ The MCSA uses the concept of “Place of Primary Use” but limits such “place” to either the residence or business address of the customer. Adoption of the MCSA approach, *per se*, would therefore not be an improvement because neither address may have any relationship to where the service is used. Consider an attorney with a residence in Virginia, employed at the Washington, D.C. office of a Chicago law firm who spends 60 percent of his or her time traveling to hearings throughout the country. In such situations, it would not be uncommon for 90 percent of his or her mobile phone usage to occur in places other than his or her home, office in D.C., or in Chicago which is the billing address for the firm’s wireless service accounts. A “primary use” standard which rationally relates to this user’s mobile usage with respect to specific incumbent service areas would focus on using some reasonably valid means to determine actual usage. The inherent characteristic of mobile use is that it is not identified with any one location.

system would be reformed in a predictable time frame, such entrenched interest could be avoided.

2. In the Longer Term, the Commission Should Move to a System Under Which Support Relates to the Wireless Carrier's Cost of Service, Not the Incumbent's Costs, and a System that will Ensure that Universal Service Support Will Be Directed to the Achievement of the Proper Statutory Objectives.

Even if a system is adopted which accurately apportions a wireless customer's usage among various ILEC support areas, there will remain a rational disconnect between the support provided and the need for such support. The different technologies incur costs in fundamentally different ways, yet the carriers potentially compete with each other in some ways. Providing support to a carrier using one technology based upon the costs of the other carrier's different technology is not competitively or technologically neutral and does not meet the requirements of the Act that support only be used for the maintenance and improvement of the supported services. The Commission is therefore obligated to begin development of a system which recognizes these fundamental differences between technologies and complies with the requirements of Section 254. The Coalition again recognizes that the Commission has some flexibility to adopt interim measures, however, it cannot avoid the proper solution indefinitely. The Commission originally committed to address the disparity issues.²⁹ Time has passed; the Commission should establish a

²⁹ For example, the Commission stated that it would determine by the end of 1997 what the basic local usage component would be for ETCs. *Report and Order*, Federal State Joint Board on Universal Service, 12 FCC Rcd 8776, 8813 (1997)(para. 67). The amount of usage is a variable related to the cost of networks that provide universal service. This determination has never been made. Moreover, the Commission has adopted models of costs for non-rural LECs. These models are constructed using wireline network components and do not consider factors related to the costs of CMRS, shared-spectrum networks. *See Tenth Report and Order*, Federal-State Joint Board on Universal Service, CC Docket No. 96-45, and Forward-Looking Mechanism for High Cost Support for Non-Rural LECs, CC Docket No. 97-160, 14 FCC Rcd 20156, 20164-166 (1999). The Commission recognized that the model does not include wireless service considerations. *Id.* at 20164. The Commission observed that wireless services are likely to become more important over time with respect to universal service issues. *Id.* The Commission committed to initiate a proceeding "in the near future" to consider these issues. *Id.*

timetable for the adoption of a rational solution.

IV. CONCLUSION


The Commission's rules regarding the determination of universal service support for mobile, shared-spectrum service applications of wireless carriers require reconsideration. The existing rules that would determine universal service fund disbursement for mobile, shared-spectrum customer applications based on a customer's "billing address" and "loop counts" will result in arbitrary universal service support that will not meaningfully direct universal service dollars where they are required to achieve the intended statutory goals. Instead of attempting to adapt incongruent wireline concepts regarding a customer's fixed location and loop counts to a wireless environment, the Commission should consider and adopt rules with respect to wireless applications that will not lead to "gaming" opportunities and will direct universal service support to network cost recovery in rural, insular and high cost areas in accordance with the specific and explicit direction of § 254 of the Act.

Respectfully submitted,

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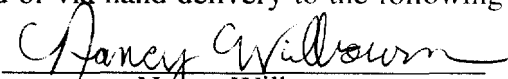

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CERTIFICATE OF SERVICE

I, Nancy Wilbourn, of Kraskin, Lesse & Cosson, LLP, 2120 L Street, NW, Suite 520, Washington, DC 20037, do hereby certify the foregoing "Petition for Reconsideration and/or Clarification of the Coalition of Rural Telephone Companies" was served on this 5th day of July 2001 by first class, U.S. Mail, postage prepaid or via hand delivery to the following parties:


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